



Town of Brookline

Massachusetts

Department of Planning and
Community Development

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Alison Steinfeld
Director

To: David Hanifin, Senior Loan Officer
FROM: Alison C. Steinfeld, Planning Director
Date: March 25, 2016
RE: 420 Harvard Street, Brookline (JFK Crossing)
FAX: 617-330-1919
Total Pages: 15

Attached please find the Town of Brookline's response to an application for Site Approval relative to 420 Harvard Street, Brookline. The original is in the USPS mail.

Please do not hesitate to contact me if you have any questions.

Thank you.



Town of Brookline

Massachusetts

BOARD OF SELECTMEN

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MELVIN A. KLECKNER
Town Administrator

March 24, 2016

David Hanifin
Comprehensive Permit Program
Massachusetts Housing Partnership
160 Federal Street
Boston, MA 02110

RE: 420 Harvard Street, Brookline (JFK Crossing)
Brookline Response to Notice of Application for C. 40B Project Eligibility Letter

Dear Mr. Hanifin:

Thank you for the opportunity to provide comments on the application for Site Approval submitted by Victor Sheen of 420 Harvard Associates, LLC to develop a residential project under GL Chapter 40B at 420 Harvard Street, Brookline. The applicant is proposing to demolish the existing structure and replace it with a six-story building consisting of thirty-six residential units on floors two through six, 2,785 square feet of retail space at the ground level and 35 parking spaces.

The Board of Selectmen requested comments from municipal departments, boards and commissions and held a public hearing on March 15th to solicit input from interested parties in the town. Since there was insufficient time for a comprehensive review and additional information is still needed before the review can be completed, a more intensive evaluation will be conducted during the Comprehensive Permit process if a Project Eligibility Letter (PEL) is issued and the applicant submits a Comprehensive Permit application.

While the Board fully anticipates that municipal departments, boards and commissions may identify other issues following a detailed review of the additional information, and the Board of Appeals may seek peer review on some of these issues, the Board of Selectmen is submitting the following preliminary comments on the proposal:

- The Town of Brookline supports the provision of affordable housing and has focused significant resources to expand housing opportunities for vulnerable populations. Attached is a summary of recent efforts by the Town to retain, improve and expand the availability of affordable housing. Also attached is a memorandum from Brookline's Housing Advisory Board.
- The proposed project fails to adhere to or even acknowledge the objective of DHCD's design guidelines that were developed to codify the subsidizing agencies' commitment to ensure that "40B affordable housing developments adhere to high standards of site and building design that enhance the quality of life for residents and the communities in which they reside." The proposed project seriously impacts the two single-family dwellings to its north and the two-family home to its rear as well as disrupts the cohesive mixed-use environment in which it is situated.

The proposed building overwhelms the site: six stories loom over the 2 ½-story residential properties and the predominantly one-story commercial area; setbacks are not only minimal but practically non-existent; and there doesn't appear to be any space provided for landscaping. No effort has been made to integrate the project into the existing development pattern. There is in fact a blatant disregard for not only the residential quality of the properties to the south and west, but to the adjacent small-scale commercial area along Harvard Street. It is interesting to note that the plans and renderings provided in the application do not even acknowledge the existing uses—no context is provided much less addressed.

- The location of this project halfway between Beacon Street (Coolidge Corner) and Commonwealth Avenue and in the heart of the JFK Crossing commercial area meets most of the tenets of SMART growth. The site is approximately a half a mile from rapid transit on both Beacon Street and Commonwealth Avenue and is served by a bus line on Harvard Street. However, the required demolition of a mixed residential/office building and an attached single car garage (including the elimination of three residential rental units) is inconsistent with the sustainable development principle of "concentrate[ing] development and mixed uses" by "encourag[ing] remediation and reuse of existing sites, structures, and infrastructure..."

While supporting the expansion of housing opportunities (as evidenced by its past and ongoing commitment of Town resources to create and maintain affordable housing), the Board of Selectmen laments the growing tendency in essentially fully developed communities like Brookline to replace existing structures including residential buildings with new buildings under the auspices of 40B. (Please note that this is more than a "tendency" in Brookline—five of the six projects currently in various stages of the 40B process involve demolition.)

- Despite the availability of nearby public transit, 35 parking spaces are inadequate for 68+ bedrooms plus two studios. This deficiency is exacerbated by the lack of any parking for service vehicles or visitors to the residential units. However, the Board is particularly concerned about the failure to provide parking for patrons, employees and deliveries

associated with the 2,785 square feet of retail space. On-street parking during the day is seriously limited in this very busy commercial area; and the Town of Brookline prohibits overnight parking anywhere in town. The ratio of parking spaces-to-residential units needs to be increased and sufficient, dedicated parking for the commercial use(s) must be provided.

- While Selectmen recognize that automated parking is an emerging phenomenon, we are very concerned about its reliability and safety as well as the potential noise impacts on the abutters. These noise impacts are especially disconcerting given how close the proposed building and particularly the actual mechanical system are to the abutting homes. Further, the potential for queuing onto Fuller Street created by vehicles waiting to access the automated system should also be fully addressed and mitigated.
- The Board recommends that the applicant explore the possibility of restricting the tenant pool to people of at least 55 years old. While the Selectmen recognize and support the need for family housing, there is also a compelling need for senior housing in Brookline and the region. Coolidge Corner has historically been—and continues to be—an ideal location for seniors given the range and abundance of services that are provided, including a municipal senior center within blocks of the subject site. Age-restricted housing will meet a significant (and growing) need, while at the same time provide opportunities to reduce the massing of the building and minimize the parking requirement from the perspective of both the neighborhood and the market.
- Although many of the units have small balconies, the project does not provide any practical usable open space for residents. If the footprint of the building were reduced, at-grade open space would be possible.

The Board of Selectmen strongly recommends that, in order to facilitate and expedite the Town's review of a Comprehensive Permit application, the applicant address the above issues and submit the following information prior to or as part of an application to the Town's Board of Appeals:

- a 3D model showing the proposed and abutting buildings
- a site plan showing abutting buildings with setbacks of the proposed building to its property lines and to abutting buildings
- a traffic and parking circulation study, including the impact that this project will have on the availability of existing on-street parking in the immediate area and queuing onto Fuller Street
- detailed information on the reliability, safety and effectiveness on the proposed automated parking system including information on the associated noise impacts and approaches to mitigate the potential noise
- a staking on the lot of the building's footprint to illustrate its size and setbacks
- a shadow study
- a storm water and drainage report
- a waiver list in tabular form

The Board also recommends that the applicant meet with the Fire Chief and Police Chief as soon as possible in order to identify and address any public safety issues. Particular note should be given to the fact that a significant amount of construction is programmed for Coolidge Corner (including a new elementary school), which could have serious implications for the ability of emergency vehicles to quickly traverse the area.

The Town of Brookline urges MHP to take affirmative action to apply the State's 40B Design Guidelines to this proposal and require that the applicant modify the proposed project to acknowledge and incorporate the relationships of this property to adjacent and nearby buildings, neighborhoods and streets. Rather than serving as a prototype of "bad" 40B development, this project can attest to the value of the guidelines and the willingness of a subsidizing agency to apply those guidelines, and thereby serve to expand the supply of affordable housing while still being sensitive to and even supportive of its environment.

The Board of Selectmen respectfully requests that MHP encourage the developer to work with the Town to achieve an improved project – one that is better integrated into the existing development pattern; does not overwhelm the adjacent residential buildings to its side and rear; has a much higher ratio of parking to number of bedrooms; provides parking for customers, employees and deliveries associated with the ground floor retail use(s); and creates affordable housing. Hopefully, MHP will condition site eligibility approval, if any, on the applicant's cooperative engagement with the Town.

If a PEL is issued, the Town looks forward to working with the developer and its architectural team to refine the proposal during the review. Town staff is available to meet with the applicant prior to any formal process in order to answer any questions or expand on the comments above.

Thank you for your consideration.

Sincerely,



Neil A. Wishinsky
Chairman

Attachment: Affordable Housing in Brookline
Memorandum from Housing Advisory Board

cc: Melvin Kleckner, Town Administrator
Alison Steinfeld, Planning Director

TOWN OF BROOKLINE

PREVIOUS MUNICIPAL ACTIONS TO MEET AFFORDABLE HOUSING NEEDS

The Department of Housing and Community Development's regulations for Comprehensive Permits under Chapter 40B direct that the Subsidizing Agency "tak[e] into consideration information . . . regarding municipal actions previously taken to meet affordable housing needs such as inclusionary zoning, [and] multi-family districts adopted under M.G.L. Chapter 40A...." Brookline has a robust commitment to multi-family and affordable housing, which is evident in its zoning by-laws and its funding and other support of affordable housing.

A. Multi-Family Housing in Brookline.

Brookline has nineteen (19) zoning districts that permit multi-family housing (more than a two-family structure) covering approximately 18% of the Town's land area. The impact of the Town's zoning is clear—approximately 20,360 units, or 77% of the Town's housing units, are in multi-family buildings. Approximately half of Brookline households rent their homes. Of these renters, approximately 50% pay less than 30% of household income for gross rent. This rate is comparable to that of the entire Boston – Quincy – Cambridge Metropolitan Statistical Area and the state average.

B. Affordable Housing in Brookline.

Brookline has a longstanding commitment to affordable housing and has often been cited by state officials as an exemplar community for creating and preserving opportunities for affordable and multi-family housing that address the goals of Chapter 40B. As of February, 2016, 2,410 of the Town's 26,201 year-round dwelling units (US Census, 2010), or 9.2%, qualified for the Subsidized Housing Inventory, as well as an additional 73 occupied affordable units serving households with incomes between 80% and 110% of area-median income. The current 40B-eligible units include 923 units owned and operated by the Brookline Housing Authority; 405 rental units owned by private investors; 769 rental units owned or controlled by non-profit organizations; 225 rental units permitted and/or in construction by 40B developers, and 88 owner-occupied homeownership units. Of the Chapter 40B-eligible units, a significant portion contains three or more bedrooms.

The Town has expended substantial municipal resources in support of all of its affordable housing programs and initiatives, facilitating the development and preservation of affordable housing, as more fully discussed below. Since 1992, the Town has spent more than \$20 million of Town appropriations, Housing Trust Funds, and Town controlled resources to support affordable housing. This is in addition to the more than \$10 million (\$9.7 million on operations and \$1.1 million on property modernization) expended annually by the Brookline Housing Authority. In 1987, the Town established an Affordable Housing Trust Fund, under the control of the Housing Advisory Board and the Board of Selectmen.

The Town has regularly directed a portion of the Town's Free Cash to the Trust Fund under circumstances where the unreserved Fund balance is less than \$5 million, in order to ensure that significant resources are available without need for Town Meeting action whenever opportunities to support affordable housing projects arise. In accordance with this policy, the Town deposited \$163,078 into the Trust Fund in FY2015.

In 2005, the Town completed a multi-year comprehensive planning process, which reaffirmed affordable housing as one of the Town's most important long-term goals, consistent with Chapter 40B, and an annual goal of 25 new affordable units per year through conversion or new construction. The Town has adhered to its commitment in both the creation of new affordable housing and the preservation of affordability in "expiring use buildings." Since 2002, the Town has added 257 new affordable units.

C. Brookline's Affordable Housing Policies, Programs and Initiatives.

Under the direction of the Town's Housing Advisory Board, which provides advice and recommendations on the Town's affordable housing policies and initiatives, and the Housing Division of the Town's Department of Planning and Community Development, staffed by two (2) housing professionals who are responsible for implementing housing policy, the Town has employed a multi-faceted approach to increasing and preserving the Town's affordable housing stock. As discussed below, the Town uses virtually all possible opportunities and strategies to accomplish its goals, including regulatory incentives such as inclusionary zoning policies; financial and technical assistance to non- and for-profit property owners and developers to preserve existing affordable units and create additional affordable units through conversion and new construction; tax incentives; the utilization of Chapter 40B in Town-supported affordable housing developments; and technical and financial assistance to those seeking to purchase, rent and rehabilitate affordable homes in Brookline.

1. Inclusionary Zoning.

The Town has significantly increased the number of affordable housing units in mixed-income developments through the Town's inclusionary zoning provisions set forth in Section 4.08 of the Town's zoning by-law. Adopted in 1987 and revised several times since then, these provisions require developers of residential projects with 6 or more units to offer at least 15% of the units to households with incomes under 100% of area median income. At least two-thirds of these units must meet Chapter 40B requirements, that is, serve households with incomes under 80% of area median income. In lieu of providing on-site units, developers of projects with 15 or fewer units may choose to make a cash payment to the Town's Housing Trust in accordance with a specific schedule. This cash payment is based upon a percent of the sales price of each unit minus \$125,000 (the imputed price of an affordable unit). The percent charged ranges from 3%

for a 6-unit project to 9.75% for a 15-unit project, encouraging developers at the higher end to provide on-site units.

Between 1996 and the present, these inclusionary zoning provisions have directly produced 104 affordable rental and condominium units (the majority of which serve households with incomes under 80% AMI) in 22 properties. In addition, the zoning by-law has resulted in \$6.4 million in contributions to the Town's Housing Trust Fund. This source, along with \$4.1 million in Town appropriations and \$1.4 million in investment income, has resulted in total revenues of over \$12 million to the Housing Trust since its inception in 1987. Housing Trust allocations have already leveraged much greater amounts of State, federal and private funding for Brookline projects.

Examples of projects developed under the Town's inclusionary zoning program include:

Goddard House, a 115-unit development, providing 17 below-market, assisted-living units to low- and moderate-income seniors;

Longwood Towers, the addition of 26 units to an existing rental complex, resulting in 2 new on-site affordable units and 4 affordable units in an existing building off-site;

Kendall Crescent, a 35-unit development combining preservation of a former public school and new construction, and providing 5 affordable condominium units, including one fully accessible unit;

Cypress Lofts, a newly constructed 45-unit condominium in which the Applicant retained 5 units for low-income renters.

Park Place Condominium, a newly constructed 9-unit condominium with 2 affordable units;

The Hammondswood, a newly constructed 59-unit condominium, providing 9 affordable units; and

The Parkway, a newly constructed 16-unit condominium, with 2 affordable units.

2. New Affordable Housing Development.

Brookline has provided financial support and assistance to developers of new affordable housing, including projects on private properties, as well as Town and other publicly-owned properties. These Town-funded

developments went through an extensive planning process, resulting in designs compatible with the surrounding neighborhoods as more particularly described below.

The Olmsted Hill project, completed in 2012, is located on a 4.8 acre former Town-owned reservoir site in the single-family neighborhood of Fisher Hill. After several years of community planning and developer selection, the Town partnered with New Atlantic Development Corporation, which dismantled and filled two underground reservoirs, created a subdivision, sold 10 market-rate, single-family lots, and developed an affordable condominium complex. This project contains 24 affordable two and three bedroom units in three buildings, including 12 units that will serve families with incomes up to 80% of AMI and 12 units that will serve families with incomes up to 100% of AMI. The 2 ½ -story and 3-story multi-family buildings are designed to harmonize with the surrounding single family neighborhood by resembling a large estate home and carriage house. Permanent subsidy provided by the Town for the affordable units includes \$1,273,982 in HOME funds, as well as \$820,605 from Brookline's Housing Trust, \$2,326,600 in revenue from the sale of the lots and a discount to the developer by the Town on the value of the land. All 24 units were sold with long-term deed restrictions.

In 1999, the Town began working with the Archdiocese of Boston Planning Office for Urban Affairs (POUA) to develop St. Aidan's Church as a "friendly 40B" development. POUA submitted an application to the Board of Appeals that conformed to development principles and guidelines established by community process. The 59-unit development was completed in 2009, and includes 36 affordable units (20 low-income rental and 16 homeownership units); preservation of the church building through adaptive reuse; and conservation of open space and specimen trees. The 3-to 5-story buildings are organized around common green space designed for passive and active recreation. The Town's contribution of \$6.1 million in Housing Trust, HOME and CDBG monies leveraged \$5 million in gap funding from the state and \$4.5 million from private investors under the federal Low Income Housing Tax Credit program. This project was identified by Housing and Community Development Undersecretary Aaron Gornstein during his introductory remarks at the September 28, 2012 conference on Chapter 40B, co-sponsored by DHCD and CHAPA, among others.

Most recently, the Town supported the Brookline Housing Authority in its first venture as a developer of privately owned affordable housing. The Town provided \$4.3 million towards the development of a 32-unit Low Income Housing Tax Credit project, constructed on an existing under-utilized parking lot serving the BHA's Trustman Apartments. The project was completed in December of 2015 and is now fully occupied.

3. Renovation of Existing Affordable Housing Units

The Town supports the preservation of existing affordable housing by providing funding for capital improvements. The Town regularly funds improvements at Brookline Housing Authority developments, to which it has contributed over \$2.3 million. It also has assisted various residences serving individuals with special needs, including a total of \$363,000 to Humanity House, a home for 10 developmentally disabled individuals, and \$614,000 to a Pine Street Inn project in Brookline, a lodging house at 1043-1045 Beacon Street which serves 28 low-income individuals. Federal AARA dollars were allocated by the Town for energy-saving improvements to several properties controlled by nonprofits, including properties under the umbrella of Specialized Housing, Inc., which serves disabled adults at several locations in Brookline. The Town and the BHA have proven their commitment to modernizing and improving the Town's existing affordable housing stock.

4. Redevelopment of Existing Market Rate Housing.

Brookline has provided extensive financial and technical assistance to property owners and for-profit and non-profit entities proposing to redevelop existing market rate housing into affordable housing units.

Currently the Town is working with the Pine Street Inn to rehabilitate two lodging houses at 51-53 and 55-57 Beals Street. These long term lodging houses were managed by Pine Street under a lease with the owners since 2004. Pine Street Inn was able to purchase the property in 2014 with over \$1.9 million in Housing Trust, HOME and CDBG funds from the Town. The buildings are being redeveloped into thirty-one "enhanced" single room occupancy (SRO) units including small bathrooms and mini-kitchenettes.

In 2001, the Town financed the purchase of a dilapidated lodging house at 1754 Beacon Street by the non-profit Brookline Improvement Coalition, Inc. (BIC), the Town's Community Housing Development Organization, and assisted BIC in the selection of a non-profit developer to rehabilitate, own and manage the lodging house. Pine Street Inn, the successful applicant, used the Town's investment of over \$907,000 in HOME monies to leverage an additional \$1.6 million commitment from three state sources for the rehabilitation of this historic building. The 14 rooms and efficiencies, permanently affordable for income-eligible persons, were occupied in the fall of 2003. The project has been both nationally recognized for innovative use of HOME funds and by the Massachusetts Historic Commission as an exemplary preservation project.

During the summer of 2002, the Housing Division staff learned of another deteriorated lodging house on the market at 1876 Beacon Street. After several affordable lodging house operators viewed the property, the Town agreed to support Caritas Communities, Inc., in acquiring the building. At the same time, the developer of Longyear Estates was seeking property to satisfy its off-site affordable housing obligation under the inclusionary provisions of the Town's zoning by-law. By partnering Caritas with Longyear and supporting Caritas in advocating for additional funding from state agencies, the Town was able to assure that Caritas received the \$1.1 million in gap funding required to complete the acquisition, rehabilitation and long-term affordability of another 15 S.R.O. units for lower-income individuals.

At the end of 2003, the Town was notified of the sale of a 6-family building at 154-156 Boylston Street. BIC purchased and completed the rehabilitation and occupancy of this building in 2005 with \$593,000 in Town-controlled CDBG funds, leveraging about \$500,000 in gap funding from the Massachusetts Housing Partnership.

5. Preservation of Affordability in Expiring Use and Other Projects.
Brookline also has actively sought to preserve affordability in its existing housing stock. One strategy has been to extend affordability at the Town's "expiring use" properties.

For example, in 2001, the Town assisted the Hebrew Rehabilitation Center for the Aged (Hebrew Rehab) in connection with its acquisition and rehabilitation of the senior housing at 100 and 112 Centre Street and 1550 Beacon Street, three such "expiring use" properties. The Town's commitment of \$1 million in Housing Trust funds and an agreement to terminate the projects' 121A tax agreements gave this non-profit the competitive edge needed to purchase the properties. At that time, only about 280 of 516 units were still affordable, with a potential loss of another 160 affordable units when restrictions expired in 10 to 15 years. As a result of the Town's commitment, Hebrew Rehab acquired and modernized the properties, and is operating them under the name of Center Communities of Brookline, with at least 60% (338) units preserved as affordable for an additional 40 years.

In 2004, the Town modified its 121A tax agreement with the owner of the subsidized project at 1371 Beacon Street, resulting in the extension of the affordability of the project's 30 units until 2028. The Town also negotiated with the Board of the 116-unit Brookline Cooperative, preserving 32 units as affordable condominium units, when the Co-op converted upon the expiration of the original HUD mortgage guarantee.

In 2015, Winn Development sought to pre-pay its federally-subsidized mortgage in order to take advantage of HUD's Rental Assistance Demonstration Program, which provides better protection for existing low-income tenants. The Town negotiated with Winn to increase the number of units that will remain affordable for the next thirty years. The Town also hopes to work with the owner to preserve the 116-unit senior building on the property as permanently affordable with additional state and Town-controlled resources.

6. Other Affordable Housing Activities and Funding.

The Town actively supports affordable homeownership in several ways. It operated a first-time homebuyer down payment assistance program from 1992 until 2010. With assistance increasing over the years from a maximum of \$25,000 to a maximum of \$175,000 per buyer, the program provided over \$5 million in HOME and CDBG funds, with some of this total reflecting the recycling of loan payoffs upon resale. Since all new units are sold subject to permanent deed restrictions, the Town regularly exercises its right of first refusal by identifying eligible buyers and holding a lottery upon all unit resales.

In short, unlike many communities in the Commonwealth, Brookline's efforts to create, promote and preserve multi-family and affordable housing have been long-standing, committed, comprehensive and effective. Brookline has committed significant Town resources to these efforts and has made measurable progress in creating and preserving affordable housing. Affordable housing that has been created in the Town is subject to permanent affordability restrictions. Through its own efforts and close cooperation with private developers, Brookline has demonstrated that affordable housing does not need to be incompatible with sound planning objectives, environmental concerns or its surrounding community.



Town of Brookline

Massachusetts

HOUSING ADVISORY BOARD

Roger F. Blood, Chair
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To: Board of Selectmen

From: Housing Advisory Board

Re: 420 Harvard Street – Proposed 40B

Date: March 15, 2016

The Brookline Housing Advisory Board (HAB) is charged with promoting the creation and preservation of housing that is affordable to individuals and families of low and moderate income, advising the Board of Selectmen on affordable housing policies and programs and the use of local, state and federal financial resources available to the Town in support of affordable housing.

Within the larger planning and regulatory review process and the HAB's broadly defined mission, the HAB has focused its primary attention upon affordable housing component of each mixed-income project. Accordingly, we expect that, in the course of reviewing any proposed 40B project, the Zoning Board of Appeals will solicit the HAB's input and recommendations regarding any ZBA-stipulated conditions that relate to each plan's affordable housing component.

Prior to the above-noted ZBA review and as part of the initial local comment period, the HAB offers the following, more generalized recommendations regarding minimum affordable housing conditions in this and all proposed 40B projects in Brookline:

1. Affordable units should be deed restricted in perpetuity and all deed restrictions should be recorded and in a form and satisfactory to the HAB.
2. The unit mix and total number of affordable bedroom and of the affordable units should match the unit mix of the market rate units.
3. Affordable units should be evenly dispersed throughout the project.
4. Affordable units should be indistinguishable from the market rate units in external appearance.
5. Affordable units should have the same interior finishes and/or appliances as the market rate units.
6. Affordable units should contain square footage of living area that is no less than:
 - 0 bedroom: 500 square feet
 - 1 bedroom: 700 square feet
 - 2 bedroom: 900 square feet
 - 3 bedroom: 1100 square feet
 - 4 bedroom: 1300 square feet

OR the average size of market rate units containing the same number of bedrooms

7. Floor plans for the affordable units which differ from those of the market rate units will not be approved without the recommendation of the Town's Department of Planning and Community Development/ Housing Division with input from the Housing Advisory Board.
8. Local Preference: The applicant will work with the Town's Department of Housing and Community Development/Housing Division to request that 70% of the affordable units be awarded to eligible households with local preference during the initial lottery, with local preference defined as a household with member who (a) lives or works in Brookline; (b) is employed by the Town or the Brookline Housing Authority; or (c) has at least one child enrolled in the Brookline public school system.
9. The Dept. of Planning and Community Development/Housing Division must review and approve the Affirmative Marketing Plan for the affordable units before it is submitted to the Subsidizing Agency for final approval. The Department of Planning and Community Development/Housing Division will work with the applicant to market the affordable units,

specifically identifying appropriate local outreach venues.

10. For the period in which the project is being monitored by the Subsidizing Agency, upon the Town's request, the owner shall share all monitoring reports with the Town's Department of Planning and Community Development/Housing Division including annual rent increases and information verifying income eligibility for affordable units.

While the HAB's primary mission relates to the project's affordable housing components, it is also concerned that the overall massing and configuration of the building should be compatible with abutting properties and the surrounding neighborhood. The HAB may offer further comment on these concerns during the ZBA hearing process.

The Town of Brookline has engaged in longstanding, creative and fruitful efforts to create, promote, and preserve multi-family and affordable housing over the years—efforts that have been recognized by the Commonwealth and which have created and preserved over 2,200 units of affordable housing in Brookline.

We look forward to working with the Applicant and the Subsidizing Agency to ensure that the above conditions are met if a comprehensive permit is granted for this project.